

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

William Joseph Holt, Jr.  
Torey Spencer Lusk  
Nancy Noel Czarnecki

CASE NUMBER: 2:11-697

I, C. Michael Laird, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. Beginning on or about June 9, 2011 in Clarendon County, in the District of South Carolina, and elsewhere, the defendants did:

**conspire to possess with intent to distribute Oxycodone (commonly known as "Oxycontin," "Percocet," and "Roxicodone"), a Schedule II controlled substance**

in violation of Title 21, United States Code, Sections 841(a)(1) & 846.

I further state I am a(n) Task Force Officer with the Drug Enforcement Administration and this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

  
Signature of Complainant

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE,

June 10, 2011  
Date

At Charleston, South Carolina  
City and State

Bruce Howe Hendricks, United States Magistrate Judge  
Name & Title of Judicial Officer

  
Signature of Judicial Officer

## AFFIDAVIT

C. Michael Laird, Task Force Officer of the United States Department of Justice, Drug Enforcement Administration, Charleston, South Carolina having been duly sworn, states:

### INTRODUCTION

I am a Task Force Officer (TFO) with the United States Drug Enforcement Administration (DEA), and have been assigned to this agency since March of 2004. I have been employed with the South Carolina Highway Patrol since February 1988. I have been assigned to the Aggressive Criminal Enforcement unit of the South Carolina Highway Patrol since October of 1992. As such, I am an investigative or "law enforcement officer" within the meaning of Title 18, United States Code, Section 2510(7), and empowered by federal law to investigate and make arrests for offenses enumerated in Section 2518 of Title 18 of the United States Code. As a Task Force Officer, I have been trained in various aspects of law enforcement, particularly the investigation of narcotics offenses. During my employment with the South Carolina Highway Patrol and my assignment with the DEA, I have participated in more than fifty significant drug investigations and prosecutions. Additionally, I have arrested, or participated in the arrest of, over 500 individuals for their violations of narcotics laws governed by federal and/or state statutes. In connection with those investigations, I have conducted surveillance, executed searches, and secured relevant information using numerous other investigative techniques, including a Court-authorized wiretap based on an affidavit that I prepared. I am currently assigned to the Drug Enforcement Administration Task Force (TF) in Charleston, South Carolina. In the current investigation, which is being worked by the DEATF, I am acting as the Case Agent. I am responsible for coordinating and overseeing all aspects of the current investigation. As Case Agent, I am thoroughly familiar with the information contained in this affidavit, either through personal investigation or through discussions I have had with other agents/officers who have conducted interviews or who have themselves obtained information, which they in turn have reported to me.

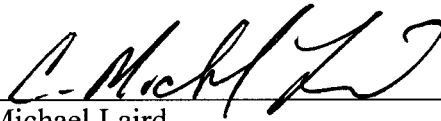
1. This Affidavit is being submitted in support of an application for a complaint and arrest warrant for **Torey Spencer LUNSK, William Joseph HOLT Jr., and Nancy Noel CZARNECKI**.
2. On June 9, 2011, LUNSK, HOLT, and CZARNECKI were traveling south on Interstate 95 in Clarendon County, South Carolina in a vehicle rented by LUNSK and operated by HOLT. At approximately 7:48 a.m., the vehicle was detected speeding by South Carolina Highway Patrol Trooper A. S. English. Trooper English issued HOLT a written warning for the traffic infraction and, based on conversations with HOLT during the issuance of the warning and observations made by Trooper English, Trooper English asked for consent to search the vehicle from both HOLT and LUNSK. The ensuing search of the vehicle resulted in the discovery of multiple previously executed prescriptions, approximately 1000 sheets of security paper utilized to issue prescriptions (each sheet capable of four prescriptions), two notebook

computers, a data storage device, a laser jet printer, prescription pills believed to be Methadone and Oxycontin (but not legitimate), and approximately eleven cellular telephones.

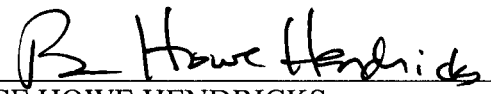
3. Pursuant to interviews with HOLT, LUNSK, CZARNECKI (after being advised of Miranda warnings) conducted by TFO Laird, HOLT and LUNSK have stated that together they obtained the security prescription paper whereupon they would utilize the names of actual doctors and the issued DEA control number issued to those doctors to generate fake prescriptions for Oxycontin and Percocet. Then, through the use of CZARNECKI and other facilitators, they would have these forged prescriptions filled at legitimate pharmacies. HOLT and LUNSK would then both use and sell the pharmaceuticals for monetary gain and to fund the purchase of future illegal purchases. This process was conducted using the computer equipment discovered during the search of the vehicle according to HOLT and LUNSK.
4. Based on the foregoing, I believe there is probable cause for a warrant to be issued for the arrest of **Torey Spencer LUNSK, William Joseph HOLT Jr., and Nancy Noel CZARNECKI** for violations of Title 21, United States Code, Section 841(a)(1) and 846.

This affidavit has been reviewed by Assistant United States Attorney Peter Phillips.

FURTHER AFFIANT SAYETH NOT.

  
\_\_\_\_\_  
C. Michael Laird  
Task Force Officer  
Drug Enforcement Administration

SWORN to and subscribed to before  
Me this 10<sup>th</sup> day of June, 2011.

  
\_\_\_\_\_  
BRUCE HOWE HENDRICKS  
United States Magistrate Judge